IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ERROLL FLANIGAN, individually and on behalf of all others similarly situated,

Plaintiff,

ν.

THE WARRANTY GROUP, INC., a Delaware corporation, and AMERICAN PROTECTION PLANS LLC, d/b/a American Residential Warranty, a Florida limited liability company,

Defendants.

Case No. 1:14-cv-01261

[Hon. Jorge L. Alonso]

NOTICE OF SETTLEMENT

Plaintiff Erroll Flanigan ("Plaintiff") and Defendants The Warranty Group, Inc. and American Protection Plans LLC (collectively, "Defendants"), hereby notify the Court that the Parties have reached agreement on the general parameters of a class action settlement agreement, the terms of which they are in the process of finalizing. Given this development, Plaintiff does not intend to move for class certification, and the Parties believe that all case deadlines should be vacated.

Dated: May 26, 2015 Respectfully submitted,

ERROLL FLANIGAN, individually and on behalf of all others similarly situated,

By: /s/ John C. Ochoa

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THE WARRANTY GROUP, INC.

By: /s/ Norman K. Beck

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AMERICAN PROTECTION PLANS LLC

By: /s/ Frank C. Rowland

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Counsel for American Protection Plans LLC

CERTIFICATE OF SERVICE

I, John C. Ochoa, an attorney, hereby certify that on May 26, 2015, I served the above and foregoing *Notice of Settlement* by causing true and accurate copies of such paper to be transmitted to all counsel of record via the Court's CM/ECF electronic filing system, on this the 26th day of May, 2015.

/s/ John C. Ochoa